

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

United States of America,)	Criminal Action No.: 9:23-cr-833-RMG
)	
v.)	
)	
Peter J. Strauss,)	
)	EXPEDITED RULING REQUESTED
Defendant.)	
<hr style="border: 0.5px solid black; margin-top: 5px;"/>		

DEFENDANT’S REPLY WITH RESPECT TO MOTION FOR STAY

The Defendant, Peter J. Strauss (“Strauss” or “Defendant”), by and through his undersigned counsel, hereby respectfully submits this brief reply (“Reply”) to the Government’s Response to Defendant’s motion to stay sentencing (the “Motion”) pending appellate consideration of his petition of mandamus regarding denial of Defendant’s recusal motion. *See* ECF 26, 32, 47, 50.

The Government does not object to the requested stay, but recommends that the Court decline to rule on the Motion until the week of sentencing. The Defendant respectfully contends that such a strategy is unnecessarily prejudicial to Defendant in that it would impose a hardship on schedules of witnesses, both lay and potentially expert, whom Defendant anticipates participating at sentencing. It likewise adversely affects the undersigned counsel’s scheduling, hearing and motion preparations.

There is no detriment to the Court, the Government or the public to have a stay issued. The Defendant respectfully requests that the Court issue the requested stay.

March 8, 2024

Respectfully submitted,

Charleston, S.C.

/s/ Joseph P. Griffith, Jr.
Joseph P. Griffith, Jr., Esquire (Fed.I.D. # 2473)
Joe Griffith Law Firm, LLC
946 Johnnie Dodds Boulevard
Mt. Pleasant, South Carolina 29464
(843) 225-5563 (tel)
(843) 722-6254 (fax)
joegriffithjr@hotmail.com
joe@joegriffith.com
www.joegriffith.com

Attorney for Defendant Peter J. Strauss